



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF AIR QUALITY
Air Compliance Program

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March 8, 2019

Dennis Melton, CPF-1 and CPF-2 Operations Superintendent
ConocoPhillips Alaska, Inc.
Kuparuk Central Production Facility #1
PO Box 196105, NSK-22
Anchorage, AK 99519

Subject: Air Quality Full Compliance Evaluation for ConocoPhillips Alaska, Inc., Kuparuk Central Production Facility #1, Permit No. AQ0267TVP01 Rev. 2, AQ0267MSS05, and AQ0267MSS06, File No. 300.16.406, Tracking No. 19-R0254-37-0001, AT No. 4821

Dear Mr. Melton:

This letter presents you with the Department's Air Quality Full compliance Evaluation (FCE) Report for ConocoPhillips Alaska, Inc., Kuparuk Central Production Facility #1, Permit No. AQ0267TVP01 Rev. 2, AQ0267MSS05, and AQ0267MSS06. The evaluation covered the period from April 1, 2016 through February 28, 2019. It was based on a comprehensive review of files and records, and was conducted with or without an on-site visit.

As a result of the Department's evaluation, the stationary source was determined to be intermittently **out of compliance** with Conditions 3(b), 87, and 90.

Non-Compliance with Condition 3(b): The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EU IDs 1 through 50, 59 and 60 listed in Table 1 to reduce visibility through the exhaust effluent by any of the following:

- a. more than 20 percent for a total of more than three minutes in anyone hour;
- b. more than 20 percent averaged over any six consecutive minutes.

Finding(s): On March 1, 2018 at 12:58 pm, a planned flaring event for the testing of the electrical system of the NGL plant resulted in emissions with greater than 20% opacity. The Department issued a Compliance Letter dated May 9, 2018 to address the excess emission event.

Action(s): No further action is required at this time if compliance is maintained.

Non-Compliance with Condition 87: The Permittee shall attach to the operating report required by condition 88, copies of any NSPS and NESHAPs reports submitted to the U.S. Environmental

Clean Air

Protection Agency (EPA) Region 10 as required by conditions 24, 25, 26, 32.6, 32.7, 32.9, 34.11, 45.2, 46.3, 47.2, 63, and 64, unless copies have already been provided to the Department at the time submitted to EPA, and

Finding(s): CPAI failed to submit the 1H18 NSPS Subpart A Excess Emissions and Monitoring System Performance Report and Summary Report Form with the 1H18 FOR. On January 22, 2019 in response to a Department inquiry CPAI submitted the missing NSPS reports.

CPAI failed to submit the 1H18 NSPS Subpart GGG Report with the 1H18 FOR. On January 25, 2019 CPAI submitted the report to the Department.

Action(s): Submit all future applicable NSPS and NESHAP reports are submitted in accordance with Permit No. AQ0267TVP01 Rev. 2. No further action is required at this time if compliance is maintained.

Non-Compliance with Condition 90: The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those term or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for 90.1 through 90.3.

Finding(s): The Permittee was found to be in violation of Conditions 3(b) and 87.

If you have any questions, please contact me at (907) 451-3189 or via email at breanna.howard@alaska.gov.

Sincerely,



Breanna Howard
Environmental Program Specialist

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